

Joshua B. Swigart, Esq. (SBN: 225557)
josh@westcoastlitigation.com

Robert L. Hyde, Esq. (SBN: 227183)
bob@westcoastlitigation.com

Hyde & Swigart

411 Camino Del Rio South, Suite 301
San Diego, CA 92108-3551

Telephone: (619) 233-7770

Facsimile: (619) 297-1022

Douglas J. Campion

Law Offices of Douglas J. Campion

409 Camino Del Rio South, Ste. 303

San Diego, CA 92108

Telephone: (619) 299-2091

Facsimile: (619) 858-0034

Attorneys for the Plaintiff

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**PATRICIA CONNOR,
INDIVIDUALLY AND ON BEHALF
OF ALL OTHERS SIMILARLY
SITUATED**

PLAINTIFFS,

V.

**JPMORGAN CHASE BANK AND
FEDERAL NATIONAL MORTGAGE
ASSOCIATION A/K/A FANNIE MAE,**

DEFENDANTS.

Case No: 10-CV-01284 DMS(BGS)

CLASS ACTION

**JOINT MOTION FOR A 30 DAY
EXTENSION OF TIME TO FILE
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Current Date: December 15, 2011

Proposed New Date: January 17, 2011

[Hon. Dana M. Sabraw]

HYDE & SWIGART
San Diego, California

1 WHEREAS Pursuant to the Parties' joint request, the Court previously set December 15,
2 2011 as the date to submit the Motion for Preliminary Approval of Class Action Settlement
3 ("Motion for Preliminary Approval");

4 WHEREAS For the past several months, the Parties have been working together diligently
5 to prepare the proper pleadings necessary for the Joint Motion for Preliminary Approval of the
6 settlement class;

7 WHEREAS a lengthy Memorandum of Understanding was drafted and executed by all the
8 parties;

9 WHEREAS the Parties are working with the proposed claims administrator to finalize the
10 best and most cost efficient method of providing notice. The proposed claims administrator is
11 currently preparing several different proposals with regard to the manner of individualized notice
12 in light of its cost and length;

13 WHEREAS the Parties are reluctant to file any request for preliminary approval of the
14 class action settlement until the manner and cost of sending notice is finalized and a firm cost
15 estimate is obtained from the proposed claims administrator; and

16 THEREFORE the Parties make this third request for a continuance of approximately 30
17 days, from December 15, 2011 to January 17, 2012, to allow the Parties time to finalize the
18 details of notice along with the most cost efficient administration of sending of notice.

19 Respectfully submitted,

20 Dated: December 15, 2011

Hyde & Swigart

21 By: /s/ Joshua B. Swigart
22 Joshua B. Swigart

23 Abbas S. Kazerounian, Esq.
24 ak@kazlg.com
25 **Kazerouni Law Group**
26 2700 North Main Street, Ste. 1050
27 Santa Ana, CA 92866
28 Telephone: (800) 400-6808
Facsimile: (949) 520-4423
Attorneys for Plaintiff

HYDE & SWIGART
San Diego, California

1 Dated: December 15, 2011

**Burke, Warren, MacKay &
Serritella, P.C.**

3 By: /s/ LeAnn Pedersen Pope
4 LeAnn Pedersen Pope
5 Shana A. Shifrin
6 Attorneys for Defendant
JPMorgan Chase Bank, N.A.

7 Dated: December 15, 2011

AlvaradoSmith, APC

8 By: /s/ Christopher Yoo
9 Christopher Yoo
10 Attorneys for Defendant
11 Federal National
Mortgage Association

12 **Signature Certification**

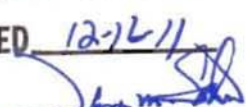
13 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures
14 Manual, I hereby certify that the content of this document is acceptable to LeAnn Pedersen Pope
15 and Christopher Yoo, counsels for Defendants, and that I have obtained Mrs. Pedersen Pope and
Mr. Narita's authorization to affix their electronic signature to this document.

16 Dated: December 15, 2011

HYDE & SWIGART

18 /s/ Joshua B. Swigart
19 Joshua B. Swigart
20 Attorneys for the Plaintiff

22 **IT IS SO ORDERED.**

23 **DATED** 12-16-11
24 
25 **UNITED STATES DISTRICT JUDGE**